IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

DAVITA KEY,)
Plaintiff,))
v.	Civil Action No.: 2:19-cv-00767-ECM
HYUNDAI MOTOR)
MANUFACTURING, ALABAMA,)
LLC; HYUNDAI ENG AMERICA,)
INC. and DYNAMIC SECURITY,	
INC.,)
)
Defendants.)

<u>HYUNDAI ENG AMERICA, INC.'S</u> MOTION FOR LEAVE TO AMEND TRIAL EXHIBIT LIST

Defendant Hyundai Eng America, Inc. ("HEA") respectfully moves for leave to amend its Trial Exhibit List (ECF. 97) to include one additional document, labeled Dynamic-Key 32 (The document is also Exhibit 18 to Davita Key's deposition transcript).

The referenced document is included on Plaintiff's Exhibit List (ECF. 102, #17), Defendant Dynamic Security's Exhibit List (ECF. 105, #14) and Defendant HMMA's Exhibit List (ECF. 95, #19), thus permitting this amendment will not prejudice any party.

Counsel for HEA corresponded with counsel for the other parties this morning to determine if there was any opposition to this motion. Counsel for Dynamic Security and HMMA advised that they do not oppose the motion. Plaintiff's counsel has not responded as of this filing.

Respectfully submitted this 2nd day of February 2023.

/s/ T. Matthew Miller

T. Matthew Miller (ASB-2129-I66T) One of the Attorneys for Defendant Hyundai ENG America, Inc.

OF COUNSEL

Cortlin Bond (ASB-6096-X12M)
Sarahanne Vaughan (ASB-1515-Q08B)
Bradley Arant Boult Cummings LLP
One Federal Place
1819 Fifth Avenue North
Birmingham, AL 35203
Telephone: (205) 521-8000
mmiller@bradley.com
cbond@bradley.com
svaughan@bradley.com
Attorneys for Defendant
Hyundai ENG America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

Heather Leonard, P.C. 2105 Deveraux Circle, Ste 111 Birmingham, AL 35243 Heather@HeatherLeonardPC.com

Leslie Palmer 104 23rd Street South, Suite 100 Birmingham, AL 35233 leslie@palmerlegalservices.com Attorneys for Plaintiff David J. Middlebrooks
Whitney R. Brown
Lehr Middlebrooks Vreeland & Thompson, P.C.
P.O. Box 11945
Birmingham, AL 35202
dmiddlebrooks@lehrmiddlebrooks.com
wbrown@lehrmiddlebrooks.com
Attorneys for Defendant
Hyundai Motor Manufacturing Alabama, LLC

Wesley C. Redmond Susan W. Bullock Ford Harrison LLC 420 20th Street North, Ste 2560 Birmingham, AL 35203 wredmond@fordharrison.com sbullock@fordharrison.com Attorneys for Defendant Dynamic Security, Inc.

/s/ T. Matthew Miller
OF COUNSEL